

Appl. No. 10/065,596  
Amdt. Dated 20 March 2006  
Reply to Office action of 20 December 2005

### REMARKS/ARGUMENTS

Applicant appreciates the consideration shown by the Office, as evidenced by the Office Action, mailed on 20 December 2005. In that Office Action, the Examiner rejected claims 1-3, 5-7, 9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado et al. US5237260 (hereinafter "Takakado") in view of Johnson Jr. US5852558 (hereinafter "Johnson") and Glennon US4507724; rejected claim 4 under 35 USC 103(a) on Takakado, Johnson, and Glennon, and further in view of Lakey et al. US4883973; rejected claim 14 under 35 USC 103(a) on Takakado, Johnson, and Glennon, and further in view of Geis et al., US5903116; rejected claims 10, 12, and 23 under 35 USC 103(a) on Takakado, Johnson, and Glennon and further in view of Stanton et al. US4179729; rejected claims 8 and 15 under 35 USC 103 (a) on Takakado, Johnson, and Glennon and further in view of Nguyen US6067237; and rejected claims 11 and 24 under 35 USC 103(a) on Takakado, Johnson, and Glennon and further in view of ordinary skill in art.

After consideration of the Office Action, claim 1 has been amended to correct a typing error in the prior amendment. Claims 16-20, 25, and 27 had been canceled previously. Claims 1-15, 21-24, and 25 remain under consideration in the present application. Applicant respectfully requests reconsideration of the application by the Examiner in light of the following remarks offered in response to the Office Action.

Applicant traverses the rejection of claims 1-3, 5-7, 9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado, Johnson, and Glennon.

With respect to Takakado, as stated in the Office Action, Takakado does "not disclose explicitly showing the inverter having a neutral output." Each of the independent claims has a corresponding recitation.

- claim 1: wherein in an operational mode, the combined rectifier and inverter provide generated power to the load port and generates a neutral output; and an inductor electrically coupling one of the legs of the inverter directly to the neutral output.
- claim 21: a neutral output directly coupled to one of the legs of the inverter through an inductor ...

The Office action has cited both Johnson and Glennon with respect to the neutral output.

With regard to Johnson, Applicant traverses the Office Action characterization of Johnson. The Office Action states:

... Johnson, Jr. teaches for the purpose of reducing step voltage changes, which affect the performance of loads that it is known for a device 400, use for outputting ac and dc voltages, having a plurality of legs that one of the legs (leg 430) is connected to a neutral output N through inductor L<sub>3</sub> (see figure 4).

Although Johnson, Jr. discloses, as claimed, that one of the legs of the inverter is electrically coupled to a neutral output (see figure 1)

However, Applicant submits that Johnson does not describe a multi-leg inverter but instead relates to a one leg inverter 420. Johnson describes element 410 as a first switching circuit 430 which is operated as a rectifier, element 420 as a second switching circuit which is operated as an inverter, and a third switching circuit operated as a balancer (column 5, lines 46-65). It is the balancer which is coupled to the neutral and not the inverter. Additionally, although Johnson references step voltage as being a problem in the background section (column 2), Johnson does not appear to teach that it is the coupling of the balancer or the single leg inverter to the neutral which is the solution.

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With regard to Glennon, as stated in Applicant's previous response, Applicant submits that Glennon does not include a leg coupled directly to the neutral. The Office Action states: "Glennon has been further cited, for the purpose of preventing returns of regenerative currents develop by the load that it is well known in the art to have a fourth leg an inverter (elements Q7, Q8) being coupled to a neutral via neutral bus line 30." Applicant continues to traverse this statement on the grounds that bus line 30 of Glennon is not coupled to ground. Instead, bus line 30 couples switches Q7 and Q8 to bus filter 14 (the DC link) which is in turn coupled to DC source 10 which itself is grounded. The voltage on the right hand side of bus filter 14 is different than that on the left, and there is no inverter leg coupled to a neutral. Furthermore, with respect to claim 1, Applicant does not see any way that the Glennon inverter could be described as one that "generates a neutral output."

Therefore, Applicant respectfully submits that a prima facie case of obviousness is not present for claims 1 and 21 and that the applied references do not teach, suggest, or disclose (either individually or in combination) the recitations of independent claims 1 and 21 and of dependent claims 2-3, 5-7, 9, 13, 22, and 26 which depend from one of the aforementioned independent claims.

The remaining dependent claims 4, 8, 10-12, 14-15, and 23-24 were each rejected under 35 USC 103(a) on Takakado, Johnson, and Glennon in view of other references directed to aspects other than the neutral output. Claims 4, 8, 10-12, 14-15, and 23-24 are likewise believed to be in condition for allowance regardless of whether the other references describe the other aspects.

In Summary, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Should the Examiner believe that anything further is needed to place the application in even better condition for allowance, the Examiner is requested to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

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